

## LAW OFFICES OF DOUGLAS T. TABACHNIK, P.C.

WOODHULL HOUSE  
63 WEST MAIN STREET  
SUITE C  
FREEHOLD, NEW JERSEY 07728

NEW YORK OFFICE:  
43 WEST 43<sup>RD</sup> STREET, STE. 21  
NEW YORK, NY 10036-7424

(732) 780-2760 (VOICE)  
(732) 780-2761 (FAX)  
DTABACHNIK@DTTLAW.COM  
WWW.DTTLAW.COM

DOUGLAS T. TABACHNIK  
Admitted in NY and NJ



CERTIFIED BY THE  
AMERICAN BOARD OF  
CERTIFICATION IN  
BUSINESS BANKRUPTCY LAW<sup>1</sup>

JULIET T. WYNE  
Admitted in FL and NJ

Reply to: New Jersey

March 21, 2025

By ECF

Hon. Robert E. Littlefield, Jr.  
U.S. Bankruptcy Judge  
U.S. Bankruptcy Court  
James T. Foley United States Courthouse  
445 Broadway, Suite 330  
Albany, NY 12207

Re: In re: Prime Capital Ventures, LLC – Chapter 11 Case No. 23-11302-rel

Dear Judge Littlefield:

This office represents Hogan Lovells US LLP in the above-referenced matter. On March 3, 2025, this office filed a First and Final Fee Application of Hogan Lovells US LLP as counsel for the Putative Debtor at docket no. 182. On March 7, 2025, the Court issued, *sua sponte*, an Order to Show Cause at docket 184 and an Amended Order to Show Cause at docket 186 for failure to comply with Local Bankruptcy Rule 9011-3. Mr. Bryant filed his Motion for Admission *pro hac vice* on January 4, 2024, at docket 49. Through administrative inadvertence, the required fee was not paid, and Mr. Bryant was unaware of this fact until the issuance of the Court's order to show cause in this case. On March 11, 2025, Mr. Bryant paid the filing fee, and on March 17, 2025, an order was granted for his admission *pro hac vice* at docket 188.

By reason of the foregoing, and pursuant to the terms of the Court's Show Cause Order, it is respectfully requested that the Court withdraw the same.

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<sup>1</sup> The American Board of Certification is a nonprofit organization jointly sponsored by the American Bankruptcy Institute and the Commercial Law League of America and accredited by the American Bar Association. ABC logo used with permission. See [abcworld.org](http://abcworld.org). This certification is not issued by any governmental agency.

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In the interim, and in other developments, the Debtor, the Office of the United States Trustee, and Hogan Lovells have agreed in principle to a 60-day adjournment of the hearing on the Application to permit the U.S. Trustee's Office time to review the Application pursuant to its request. The Parties have provisionally consented to an interim adjourned date of May 14, 2025, as a control date, pending the posting of June hearing dates by chambers. This office has filed, contemporaneously with this letter, a notice of adjournment form requesting the adjournment of the April 9, 2024 hearing date for the Application.

Thank you for your consideration of this matter.

Respectfully submitted,



Douglas T. Tabachnik

DTT/rd

C: Christopher R. Bryant, Esq. – via E-mail  
Phoebe A. Wilkinson – via E-mail  
Fred Stevens, Esq. – Via ECF  
Lisa Penpraze, Esq. Via ECF  
All others having filed Notices of appearance - via ECF